

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH SIMMONS,

Plaintiffs,

v.

CITY OF PHILADELPHIA, et al.,

Defendants.

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**Civil Action
No. 22-1644**

ORDER

AND NOW, this _____ day of _____, 2025, it is hereby **ORDERED** and **DECREED** that Counsel for Defendants shall be permitted to depose Jabri Riggins, # QP0885, an incarcerated person, at a time, date and manner convenient to the parties and the administration at the Pennsylvania Department of Corrections.

BY THE COURT:

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**DEFENDANTS' MOTION TO DEPOSE
AN INCARCERATED INDIVIDUAL**

Defendants, by and through it undersigned counsel, hereby files this Motion to Depose an Incarcerated Individual and state in support thereof:

1. Plaintiff Joseph Simmons in his civil action against Defendants alleges that he was assaulted by his cellmate on February 21, 2021.
2. This alleged assault is the basis of this case, and the cellmate Plaintiff alleges assaulted him has been identified as Jabri Riggins.
3. Jabri Riggins is currently incarcerated at SCI Fayette of the Pennsylvania Department of Corrections with an inmate number of QP0885.
4. Federal Rule of Civil Procedure 30(a)(2)(B) requires an Order to depose an incarcerated individual.
5. Defendant respectfully requests that this Honorable Court issue the proposed order allowing the deposition of Jabri Riggins.

WHEREFORE, Defendant asks that the Court enter an Order in the form proposed.

Respectfully submitted,

Date: April 4, 2025

/s/ Derek Kane

Derek Kane

Deputy City Solicitor

1515 Arch Street, 14th Floor

Philadelphia, PA 19102

derek.kane@phila.gov

Attorney for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on the date below Defendants' Motion to Depose an Incarcerated Individual was filed via the Court's electronic filing system and is thus available for downloading by all parties.

Respectfully submitted,

Date: April 4, 2025

/s/ Derek Kane
Derek Kane
Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
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Attorney for Defendants